

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

GENERAL RETIREMENT SYSTEM OF
THE CITY OF DETROIT, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.,
HANS VESTBERG, and MATTHEW ELLIS

Defendants.

Case No. 3:23-cv-05218 (RK) (RLS)

Hon. Robert Kirsch
District Judge

Hon. Rukhsanah L. Singh
Magistrate Judge

**JOINT STIPULATION AND ORDER REGARDING
LEAD PLAINTIFFS' FILING OF THE AMENDED
CLASS ACTION COMPLAINT**

Lead Plaintiffs Stichting Pensioenefonds Metaal en Techniek, Stichting Pensioenefonds van de Metalektro, Stichting Mn Services Aandelenfonds Noord-Amerika (the “Dutch Funds”), AkademikerPension, E. Öhman J:or Fonder AB, Storebrand Asset Management AS (the “Institutional Investor Group”) (collectively, “Lead Plaintiffs”), and Defendants Verizon Communications Inc., Hans Vestberg, and Matthew Ellis (“Defendants”), by and through their respective undersigned counsel, hereby stipulate to and request that the Court SO ORDER the schedule set forth below for Lead Plaintiffs to file the Amended Class Action Complaint for Violations of the Federal Securities Laws (“Amended Complaint”) and for Defendants to answer or move to dismiss the Amended Complaint:

WHEREAS, on August 18, 2023, Plaintiff General Retirement System of the City of Detroit filed the Class Action Complaint (ECF No. 1);

WHEREAS, on October 20, 2023, the Court issued an Order appointing the Dutch Funds and the Institutional Investors Group as Lead Plaintiffs and Grant & Eisenhofer and Kessler Topaz Meltzer & Check, LLP as Lead Counsel (ECF No. 26);

WHEREAS, the parties have met and conferred concerning a deadline for Lead Plaintiffs to file the Amended Complaint and for a subsequent briefing schedule;

NOW, THEREFORE, the parties hereby stipulate and agree, by and between the attorneys for the undersigned parties to this action and subject to the Court’s approval, that the following deadlines govern this action:

1. Lead Plaintiffs shall file the Amended Complaint by **December 22, 2023**;
2. Defendants shall file any motion(s) to dismiss (or answer the Amended Complaint) on or before **February 27, 2024**;

3. Lead Plaintiffs shall respond to Defendants' motion(s) to dismiss on or before **April 15, 2024**; and

4. Defendants shall file any reply in further support of any motion(s) to dismiss on or before **May 15, 2024**.

Dated: November 2, 2023

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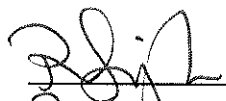
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*Local Counsel for Lead Plaintiffs
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SO ORDERED:

This 3d day of November 2023.



Rukhsanah L. Singh, USMJ